

Consultation on revision of the EU Emission Trading System (EU ETS) Directive

Fields marked with * are mandatory.

Introduction

On 24 October 2014, the European Council agreed on the 2030 framework for climate and energy [1], including a binding domestic target for reducing greenhouse gas (GHG) emissions of at least 40% in 2030 as compared to 1990. To meet this target, the European Council agreed that the emissions in the EU Emission Trading System should be reduced, compared to 2005, by 43%. A reformed EU ETS remains the main instrument to achieve the emission reduction target. The cap will decline based on an annual linear reduction factor of 2.2% (instead of the current 1.74%) from 2021 onwards, to achieve the necessary emission reductions in the EU ETS. The European Council furthermore gave strategic guidance on several issues regarding the implementation of the emission reduction target, namely free allocation to industry, the establishment of a modernisation and an innovation fund, optional free allocation of allowances to modernise electricity generation in some Member States.

The strategic guidance given by European leaders on these elements will be translated into a legislative proposal to revise the EU ETS for the period post-2020. This constitutes an important part of the work on the achievement of a resilient Energy Union with a forward looking climate change policy, which has been identified as a key policy area in President Juncker's political guidelines for the new Commission.

The purpose of the present stakeholder consultation is to gather stakeholders' views on these elements. This consultation focuses on issues not yet addressed in the consultations recently conducted for the 2030 Impact Assessment[2], the Impact Assessment for the carbon leakage list for 2015-2019[3] and the consultation conducted on post-2020 carbon leakage provisions[4].

In order to take stock of the EU ETS (established by Directive 2003/87/EC) as a policy measure, this consultation also contains questions concerning the general evaluation of this policy measure. The questionnaire consists of 7 chapters. You are invited to answer questions on the chapters which are relevant to you.

0. Registration

0.1. What is your profile?*

- Business
- A small and medium enterprise
- Trade association representing businesses
- SME business organisation
- Government institution/regulatory authority
- Academic/research institution
- Non-governmental organisation
- Citizen
- Other

0.2. Please enter the name of your business/organisation/association etc.:

projekt21plus GmbH

0.3. Please enter your contact details (address, telephone, email):*

Volkartstr. 46, 80636 München, Germany; 0049/89/35653344;
t.uhlmann@projekt21plus.de

0.4. If relevant, please state if the sector/industry you represent falls under the scope of the EU

ETS:*

- yes
- no
- not relevant

0.5. If relevant, please state what sector your represent.:

- Energy-intensive industry
- Energy sector
- Other

0.6. The results of this stakeholder consultation will be published unless stated otherwise. Can we include your replies in the publication?*

- yes
- no
- partially

0.7. Register ID number (if you/your organisation is registered in the Transparency register):

1. Free allocation and addressing the risk of carbon leakage

The European Council has concluded that free allocation to prevent the risk of carbon leakage should not expire as foreseen in the current legislation, but should continue also after 2020 as long as there are no comparable efforts to reduce emissions in other major economies.

Extensive stakeholder consultation was already carried out on the post-2020 carbon leakage provisions, as well as on aspects related to innovation support. The process included three full-day stakeholder meetings (June, July and September 2014) and a written consultation conducted for 12 weeks (8 May – 31 July, 2014). The written consultation covered 23 multiple choice questions with space for motivations, and a question allowing respondents to bring up any other issue they felt was important or insufficiently covered.

The documents and minutes of the meetings, as well as the submissions and the analysis thereof in the case of the written consultation, are available on the Commission website.

Information from the stakeholder meetings:

http://ec.europa.eu/clima/events/articles/0090_en.htm

http://ec.europa.eu/clima/events/articles/0095_en.htm

http://ec.europa.eu/clima/events/articles/0097_en.htm

Replies and summary of the written consultation:

http://ec.europa.eu/clima/consultations/articles/0023_en.htm

The results of the above mentioned public consultation are being taken into account in the preparation of the legislative proposal. In order to reduce the administrative burden for stakeholders and the Commission, the present consultation focuses on issues not already covered in this recently finalised public consultation. Respondents are nevertheless invited to add to the replies provided in the earlier consultations if deemed necessary in the light of the conclusions of the European Council in this area.

1.1 The European Council called for a periodic revision of benchmarks in line with technological progress. How could this be best achieved in your view and, in particular, which data could be used to this end? How frequently should benchmarks be updated, keeping in mind administrative feasibility?

4,500 character(s) maximum

Generally, we prefer a system with a carbon price floor as in the UK. The level of this carbon floor price should be linked to the example set in the UK that planned to rise this price every year. This would provide an instrument that really offers a reliable basis for the EU-ETS.

Concerning the data which should be collected, we consider it to be kept as simple as possible. To address the energy consumption of the enterprises is essential and so is the amount of resources that are used, calculated per output unit. Wise and positive incentives can be introduced if the origin of the energy is taken into account. We imagine a system that rewards power supply, which is composed entirely of renewable resources. To consider the origin of the energy it is helpful to respect the carbon output intensity.

The benchmarks ought to be set annually. For us it seems to be the most functional way to be updated, primarily because the majority of businesses calculations are made annually as well. One important additional benefit is the increasing probability for further reduction of GHG emissions due to more frequent updates of the benchmarks. If they are set annually, more enterprises have the opportunity, to get admitted by the range of benchmark. The individual motivation and thereby increasing efforts should push the benchmark in total.

1.2 The European Council has defined guiding principles for the development of post-2020 free allocation rules which provide inter alia that "both direct and indirect costs will be taken into account, in line with the EU state aid rules" and that "the most efficient installations in these sectors should not face undue carbon costs leading to carbon leakage" while "incentives for industry to innovate will be fully preserved and administrative complexity will not be increased" and while "ensuring affordable energy prices". Do you have views how these principles should be reflected in the future free allocation rules?

4,500 character(s) maximum

In general we regret the fact that the European Council failed to end the free allocation of emission allowances. Following the original idea of the European Commission, all allowances would have been auctioned from 2020. Taking the new guiding principles of the Council into account, even a distinct moment to end the free allocation is unfortunately not provided.

If the European Council implements their plan mentioned in the question above, the EU gets itself into dependency on other countries which are not as engaged in reduction of GHG emissions as the EU. Thus it is necessary to recognize the fact that the EU abstains from the opportunity to get a real first-mover-advantage by gaining benefits from innovation.

1.3 Should free allocation be given from 2021 to 2030 to compensate those carbon costs which sectors pass through to customers? How could free allocation be best determined in order to avoid windfall profits?

4,500 character(s) maximum

We reject any plan of free allocation of allowances in order not to distort the market and to set more reliable guidelines.

Nevertheless, if there will be free allocations in the long-run, these allocations should be clearly linked to ambitious benchmarks. Benchmarks therefore must be reliable.

To strengthen this reliability it is necessary to avoid one-hit-wonder benchmarks. We suggest that companies should meet the benchmark in two years in succession to get a profit from free allocation. In the corresponding first year they have to participate in the process of auctioning of allowances.

1.4 Are there any complementary aspects you would like to add to the replies given to the previous written consultation in the light of the European Council conclusions?

4,500 character(s) maximum

2. Innovation fund

The European Council has concluded that 400 million allowances in 2021 to 2030 should be dedicated for setting up an innovation fund to support demonstration projects of innovative renewable energy technologies, carbon capture and storage (CCS) as well as low carbon innovation in industrial sectors. To make this fund operational, a legal basis has to be created in the EU ETS Directive while further implementation modalities can be set out in secondary legislation. The work can build on the experience with the existing "NER300" programme which made available 300 million allowances for CCS and innovative renewable energy technologies[1].

With regard to establishing a legal basis for the innovation fund as part of the revision of the EU ETS Directive, the Commission seeks feedback on the following questions:

2.1 Do you see reasons to modify the existing modalities applied in the first two calls of the NER300? Are there any modalities governing the NER 300 programme which could be simplified in the design of the innovation fund? If you see the need for changes, please be specific what aspects you would like to see changed and why.

4,500 character(s) maximum

We appreciate the intention to continue the general modalities of the NER300 programme and increase the amount of allowances dedicated to the new programme. However we have to note that we see critical aspect about the technology of CCS, concerning acceptance and feasibility and are not in favor to support further research in CCS with EU finance's. Moreover, there are important risks regarding CCS which are not able to be calculated totally at the contemporary stage.

We could imagine a programme that supports low carbon innovation in the industrial sector with focus on recycling of carbon instead of storage. This innovation may not produce any additional emissions and is imaginable on the field of methanation for example.

The supportable carbon innovation may not took place in the coal energy sector.

In the structure of the NER300 programme we worry about the linking between the price for emission allowances and the volume of the NER300 programme. Currently when the price for allowances is at a quite low level, the support for the innovation fund is at a quite low level as well. We prefer a future structure of the programme which is independent from the variability of prices for emission allowances and deliver a reliable basis for financing innovation projects seriously.

2.2 Do you consider that for the extended scope of supporting low-carbon innovation in industrial sectors the modalities should be the same as for CCS and innovative renewable energy technologies or is certain tailoring needed, e.g. pre-defined amounts, specific selection criteria? If possible, please provide specific examples of tailored modalities.

4,500 character(s) maximum

First of all the focus should only be set on innovative renewable energy technologies and on low carbon innovation in the industrial sector. It may not be set on CCS as we mentioned above. For us, the probability of realisation of the CCS technology in an appropriate period of time seems insignificant compared to further innovation in renewable energy technologies and other broader low-carbon innovation in industrial sectors.

2.3 Are there any complementary aspects regarding innovation funding you would like to add to the replies given to the previous written consultation in the light of the European Council conclusions?

4,500 character(s) maximum

In a sense of effective research programmes for innovations in energy and industry we consider it imprudent to limit the maximum amount of projects per country. In the NER300 programme the number of projects supported by the programme might have not exceeded three projects per Member State so far. For serious progress in innovation and in reaching a lower level of emissions, it should be free how many projects are supported by the new NER400 programme, even at the risk of concentrating several projects just in a few number of Member States.

3. Modernisation fund

The European Council has concluded that 2% of the total EU ETS allowances in 2021 to 2030 should be dedicated to address the particularly high investment needs for Member States with GDP per capita below 60% of the EU average. The aim is to improve energy efficiency and to modernise the energy systems of the benefitting Member States. The fund should be managed by the beneficiary Member States, with the involvement of the European Investment Bank (EIB) in the selection of projects. To make this fund operational, a legal basis has to be created (in the EU ETS Directive), while further implementation modalities can be set out in secondary legislation.

With regard to establishing a legal basis for the modernisation fund as part of the revision of the EU ETS Directive, the Commission seeks feedback on the following questions:

3.1 Implementation of the modernization fund requires a governance structure: What is the right balance between the responsibilities of eligible Member States, the EIB and other institutions to ensure an effective and transparent management?

4,500 character(s) maximum

The Member States should burden the main responsibility for the allocation of the extra of 2 % of the allowances. These Member States have to deliver an annual report of their activities on this scope and this reports are checked by an European authority, which can give guidelines and assistance for the Member States in questions how to do the allocation and to improve the effectiveness of the actions. This authority should not necessarily be the EIB, but rather an independent organisation like a research institute or an university.

3.2 Regarding the investments, what types of projects should be financed by the modernisation fund to ensure the attainment of its goals? Should certain types of projects be ineligible for support?

4,500 character(s) maximum

To modernise the energy system it is essential to privilege projects and investments in the development of renewable energy production. Furthermore we can imagine the Member States to give support to other projects that promote the energy revolution towards a renewable energy system, such as the construction of grids, storages, flexibility options and an increasing connection of and cooperation in transnational electric power supply.

Of course there must be distinct criteria of ineligible projects, such as nuclear energy, coal and fracking as the three most important aspects to be excluded by support in our eyes.

3.3 Should there be concrete criteria [e.g. cost-per-unit performance, clean energy produced, energy saved, etc.] guiding the selection of projects?

4,500 character(s) maximum

As mentioned above, it is primarily important to support the energy revolution towards a renewable energy system in these Member States as well as in the entire EU. The need for those projects can be formulated in concrete criteria which is linked for example to the emissions of new energy production units. In order to construct a new energy system it is necessary that these new energy production units may only produce clean energy out of renewable resources. All projects should be measured by their contribution to the energy revolution and all criteria should be developed by this fundamental point.

Though projects to be supported could also include the improvement of infrastructure to strengthen service security and the integration of new renewable energy production. Especially in the respective Member States the enhancement of grids is a quite important aspect the modernisation fund should consider.

3.4 How do you see the interaction of the modernisation fund with other sources of funding available for the same type of projects, in particular under the optional free allocation for modernisation of electricity generation (see section 4 below)? Would accumulation rules be appropriate?

4,500 character(s) maximum

It's important to construct the modernisation fund not just as a complete duplicate to other forms of allocation that favours modernisation of electricity generation. However it must be clear that all methods that are introduced should have the same focus, the focus on building up an energy system which is entirely based on renewable sources.

We consider it a positive aspect that there are several approaches to promote the transformation of the energy system towards a zero-emission electricity generation.

3.5 Do you have views how the assessment of the projects should be reflected in the forthcoming 2030 governance process (e.g. national climate programmes, and plans for renewable energy and energy efficiency)?

4,500 character(s) maximum

As previously mentioned the Member States should deliver reports of their activities. Overall, the guiding and mostly relevant measure should be the carbon-intensity of energy generation per country and the variation of this number over the years. It must be the primarily number to address success in the modernisation of the energy system.

3.6 Should the level of funding be contingent on concrete performance criteria?

4,500 character(s) maximum

The level of funding per Member State should not be contingent on concrete performance criteria in order to prevent leaving some countries behind and stopping early beginnings of transformation.

The level of funding within the Member States has to be linked to concrete performance criteria. Some kind of benchmark regulation is possible in this funding and would be the best to be measured and operationalised.

4. Free allocation to promote investments for modernising the energy sector

The conclusions of the European Council provide for the continuation after 2020 of the mechanism foreseen in Article 10c of the EU ETS Directive, which allows some Member States to opt to hand out free allowances to power plants in order to promote investments for modernising the energy sector. The current Article 10c modalities, including transparency, should be improved to promote investments modernising the energy sector, while avoiding distortions of the internal energy market.

With a view to reviewing and improving the current modalities as part of the revisions to the EU ETS Directive, the Commission seeks feedback on the following questions:

4.1 How can it be ensured that investments have an added value in terms of modernising the energy sector? Should there be common criteria for the selection of projects?

4,500 character(s) maximum

As mentioned above in the answer on question no. 1.3 we see all forms of free allocations quite critical due to market distortions and the lack of reliability.

We consider the fact highly questionable that power plants should receive free allowances anyway, because the power plants we wish to be built don't need allowances at all due to the reason that they are based on renewable resources and thus are free of emissions.

Only if free allocations should be realised, we recommend common criteria for these investments to modernise the energy sector. Common criteria is more resilient and it prevents individual Member States to build up their own measures including the possibility that these measures are potentially less strict like the common EU criteria. Not to jeopardize the common aim of reducing emissions in all industrial sectors must be set for top priority and so it is necessary for us to build up common criteria for free allocations very well. The risk of producing a bias in the market of allowances due to free allocations must be considered.

4.2 How do you see the interaction of the free allocation to energy sector with other sources of funding available for the same type of projects, e.g. EU co-financing that should be made available for the projects of common interest under the 2030 climate and energy framework? Would accumulation rules be appropriate?

4,500 character(s) maximum

There should not be any free allocations in our point of view thus the different rules won't interact with each other in general.

If the projects are able to provide incentives that are suitable for the EU emission aims, they don't have to be supported by free allowances and you can prevent any conflict in advance.

4.3 Do you have any views how the assessment of the projects should be reflected in the forthcoming 2030 governance process (e.g. as regards improving transparency)?

4,500 character(s) maximum

We reject any plan of free allocation of allowances.

4.4 The maximum amount of allowances handed out for free under this option is limited. Do you think eligible Member States should use the allowances for a period of time specified in advance (e.g. per year), or freely distribute them over the 2021-2030 period? (Please explain your motivation.)

4,500 character(s) maximum

Generally we reject any plan of free allocation of allowances.

In the case of the Member States may hand out free allowances, it would be the best to let them be free to choose when to deliver. It can improve the effectiveness of activities and strengthen the self-responsibility of the countries. That includes the possibility of gaining benefits from learning effects and to respect special local characteristics.

4.5 Should there be priorities guiding the Member States in the selection of areas to be supported?

- yes
 no

If so, which of the following areas, if any, currently supported through investments for modernisation of electricity generation up to 2020 should be prioritised for support up to 2030 and why?

- Interconnectors
 Smart Grids
 Super-critical coal
 Gas
 Renewable energy
 Energy storage
 Energy efficiency
 Other (please elaborate)

Please explain in detail:

4,500 character(s) maximum

The supported areas must lead to a system with zero-emission electricity generation. This system cannot be reached by fossil resources such as coal or gas. Improvements in renewable energy supply technology must be top priority.

To connect the renewable energy within a intelligent grid system that is able to deal with the flexibility of fluctual renewable sources such as wind and photovoltaik, investment in energy storage are necessary as well.

4.6 How can improved transparency be ensured with regard to the selection and implementation of investments related to free allocation for modernisation of energy? In particular regarding the implementation of investments, should allowances be added to auctioning volumes after a certain time period has lapsed in case the investment is not carried out within the agreed timeframe?

4,500 character(s) maximum

No allowances should be added to auctioning volumes. A separation of the different pools of allowances increases the reliability of the whole ETS and is an important method to secure the effectiveness. If an implementation of investment fails, the allowances that were given to this investment must be put back in the pool of allowances of its origin, i. e. in the pool of free allowances in that case.

5. SMEs / regulatory fees / other

In order to allow taking stock of the EU ETS aspects beyond those examined by the European Council, respondents are also invited to provide feedback on certain other questions.

The Commission ensures that better regulation principles govern all of the policy work, including that the specificities of small and medium sized enterprise (SMEs) are taken into due consideration. Member States can exclude certain small installations from the EU ETS in the current trading period (2013-2020) if taxation or other equivalent measures are in place that will cut their emissions. If such a possibility was to be reviewed, a legal basis would have to be created in the EU ETS Directive.

The accurate accounting of all emission allowances issued is assured by a single Union Registry with strong security measures. The operations were centralised in a single Registry operated by the Commission, following a revision of the ETS Directive in 2009. This has replaced Member States' national Registries. Despite the considerable resources from the EU budget required for maintaining the EU Registry, as does supporting work on auctioning, the Commission does not have the possibility to charge any fees. However, Member States administrators may still charge Registry fees to account holders administered by them. There are discrepancies in fees across different Member States.

5.1 Are there any EU ETS administrative requirements which you consider can be simplified? Do you see scope to reduce transaction costs, in particular for SMEs? If yes, please explain in detail.

4,500 character(s) maximum

5.2 Member States had the possibility to exclude small emitting installations from the EU ETS until 2020. Should this possibility be continued? If so, what should be the modalities for opt-out installations to contribute to emission reductions in a cost-effective and economically efficient manner? Should these be harmonised at EU level?

4,500 character(s) maximum

5.3 How do you rate the importance of a high level of security and user-friendliness of the Union Registry? Do you think the costs for providing these services should be covered via Registry fees?

4,500 character(s) maximum

**5.4 Do you consider discrepancies in Registry fees in different Member States justified?
Should Registry fees be aligned at EU level?**

4,500 character(s) maximum

5.5 Under the current EU ETS Directive, at least 50% of the revenues generated from the auctioning of allowances should be used by Member States for climate-related purposes. For the calendar year 2013 Member States have reported to have used or to plan to use 87 % on average to support domestic investments in climate and energy. Do you consider the current provisions regarding the use of the revenues adequate for financing climate action? If not, please explain why?

4,500 character(s) maximum

6. General evaluation

6.1 How well do the objectives of the EU ETS Directive correspond to the EU climate policy objectives?

How well is the EU ETS Directive adapted to subsequent technological or scientific changes?

4,500 character(s) maximum

We suppose to recognise an inadequacy when you match the EU climate policy objectives with the objectives of the EU ETS Directive. Overall the EU aims to reduce their GHG emissions by 40 % in 2030. With the annually reduction rate of 2.2 % only the industries under ETS can reach the 40 % reduction approximately. A reduction of other sources of emissions such as the transport sector, the agriculture and private energy consumption of the households, just to name the three most important ones, are not really taken into account. The EU can only reach their 40 % aim, if these other sectors reduce their emissions by the same rate as the industry under the ETS does. In absence of serious potentials for reducing emissions especially in the transportation sector and the agriculture it seems quite uncertain that these aims could be reached. Otherwise the EU should increase the reduction rate of 2.2 % beginning from 2020 to ensure their only possibility to get the emissions to a level of 40 % lower in 2030.

6.2 What are the strengths and weaknesses of the EU ETS Directive? To what extent has the EU ETS Directive been successful in achieving its objectives to promote emission reductions in a cost-effective manner compared to alternatives, e.g. regulatory standards, taxation?

4,500 character(s) maximum

To start with the weaknesses of the EU-ETS we have to mention several aspects:

- The reference year 1990: It is highly misleading to use 1990 as the reference year for ancient emissions. The huge reductions in emissions that took place in former socialist Countries Europe in the early 90s distorts the whole Emission Trading System because these reductions have nothing to do with an environmental objective.

- No ambition in the aim of reducing the emissions: Reducing emissions of 40 % in 2030 compared to 1990 will probably not be enough to stop the global warming before reaching the 2 degree threshold. Considering the example-setting role of the EU for a large-scale ETS this aspects lets the EU-ETS look quite poor.

- Amount of allowances: Following the small demands in the reduction rates of the EU anyway, there are far too much allowances in the market. The amount of allowances had never been appropriate in all the years since 2005 when the ETS started. The amount of allowances had never been planned properly in the three periods. Furthermore we cannot hope for a change of this situation at least until 2020, probably even later.

- Price signal: Due to the inappropriate amount of allowances, the ETS had never been able to set a reliable price signal for the industry since ten years.

- Cost-effective: Because of the failure to set a price signal the ETS also failed to be cost-effective. No reduction in emissions was reached causal by the ETS so it is not possible to measure any effectiveness of this attempt.

- Free allowances: To spread free allowances distorts the market for allowances and helps to avoid effectiveness of the ETS. Moreover it proves that the aim of reducing the emissions is not handled seriously.

- Exceptions: The exceptions for a huge range of industrial sectors weaken the whole system and is not effective to reach the reduction aims. The most relevant sectors that are excluded from ETS are private transportation and agriculture that are highly relevant for the level of emissions. Only 50 % of all emissions in the EU are under ETS which make it quite improbable to reach the reduction aims.

Some positive aspects we can think of:

- The construction of the ETS in the EU is an experiment which is based on a theoretically clever approach. At least on paper it seems to be a wise idea to build up a market for emission allowances. However, this experiment failed and was not able to set any incentives to reduce emissions.

6.3 To what extent are the costs resulting from the implementation of the EU ETS Directive proportionate to the results/benefits that have been achieved, including secondary impacts on financing/support mechanisms for low carbon technologies, administrative cost, employment impacts etc.? If there are significant differences in costs (or benefits) between Member States, what is causing them?

4,500 character(s) maximum

The costs are not yet proportionate to the benefits due to the failure of the ETS to set a viable price signal and a real incentive to reduce emissions. The great majority of the reduction of emissions was led by the economic situation in general and not by the ETS. That's the main reason why the emissions has decreased in Europe since the financial and economic crisis starting in 2008.

Regarding the aim of the ETS the costs of the programme may not be the first and only aspect to think of when the ETS is introduced.

6.4 How well does the EU ETS Directive fit with other relevant EU legislation?

4,500 character(s) maximum

We consider the EU-ETS as suitable to other EU legislation and to fit in the common processes in the EU. Though we regret the fact that the European Council failed to implement some clever incentives made by the European Parliament or the Commission such as the finishing of free allowances until 2020 and weakens these wise approaches. However, this seems to be a problem which is quite common in the EU legislative and the ETS reproduces these usual differences between the Council and the Parliament or the Commission.

6.5 What is the EU value-added of the EU ETS Directive? To what extent could the changes brought by the EU ETS Directive have been achieved by national measures only?

4,500 character(s) maximum

On the one hand it seems necessary to install an emission trading system on a European level due to reduce distortions between the markets in several Member States. A large-scale programme which affects many industrial sectors and is important for a broad scale of the domestic economy like the ETS should be implemented on a large-scale level like the EU. On the other hand we realise several possibilities to improve the reduction rate by intelligent national legislation to reach a more ambitious aim in reducing emissions. To improve the ETS is a task for every national government as well. As an example we would like to mention the possibility to set up a carbon price floor in a Member State to strengthen the effectiveness of the ETS as this is one of the most elementary instruments to enhance the price signal. Other measures in the scope of responsibility of national governments are connected with developments on the energy sector, pushing forward the transformation towards a totally renewable energy system.

6.6 Do you have any other comment on the revision of the EU ETS Directive that you would like to share?

4,500 character(s) maximum

Concerning this questionnaire we would like to stress that we regret the fact that it is only available in English. Because of it is an European Survey it should be translated into the 24 languages of the European Union to allow a fair and democratic process of participation. Otherwise the majority of EU citizens is excluded from this participation which cannot be the intention of an EU Survey.

Contact

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